

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

ETHAN BROOKS HARTER
Plaintiff,

v.

REALPAGE, INC.
Defendant.

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CIVIL ACTION NO. 4:16-cv-00100

**DECLARATION OF DEBRA STOCKTON IN SUPPORT OF DEFENDANT
REALPAGE INC.'S TRADITIONAL MOTION FOR SUMMARY JUDGMENT**

I, Debra Stockton, declare as follows:

1. "My name is Debra Stockton, I am of sound mind, capable of making this affidavit. I am over 18 years of age and I have personal knowledge of the facts stated in this affidavit, and they are true and correct.

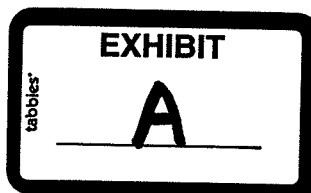
2. I am the Senior Vice-President of RealPage, and I served in this capacity since August 1, 2013. I am personally familiar with the business and standard practices of RealPage.

3. RealPage is a provider of property management software, including LeasingDesk. LeasingDesk is a resident screening technology that allows property management companies access to an in-depth background check for prospective renters. LeasingDesk provides background checks including credit history, criminal history, sex offender history, rental history and evictions.

4. The statements that form the basis of Ethan Brooks Harter's Petition were contained in two RealPage LeasingDesk reports, one generated by Legend Oaks Apartments on July 11, 2015 and one generated by Helios Apartments on July 12, 2015. A true and correct copy of the RealPage LeasingDesk report submitted to Legend Oaks Apartments on July 11, 2015 is attached hereto as Exhibit A-1. A true and correct copy of the RealPage LeasingDesk report submitted to Helios Apartments on July 12, 2015 is attached hereto as Exhibit A-2.

5. These reports were generated in accordance with RealPage's contractual agreements with the companies managing the above properties. A true and correct copy of RealPage's contract with Fairfield Properties (Legend Oaks Apartments) is attached hereto as Exhibit A-3. A true and correct copy of RealPage's contract with Greystar (Helios Apartments) is attached hereto as Exhibit A-4.

6. RealPage is not aware of any errors in the reports. RealPage's reports state the information exactly as it was found in public records. RealPage believes the information in



public records is true. RealPage had no reason to question the truthfulness of the information in the public records.

7. The public record disputed by Mr. Harter correctly reported a conviction in Montgomery County, North Carolina, Case No. 700487, and stated that the type of offense was "NOT PROVIDED." An additional search conducted by RealPage generated a report from Backgroundchecks.com, which confirmed the contents of RealPage's reports and the accuracy of the information reported. RealPage learned Mr. Harter's conviction was related to a traffic offense. A true and correct copy of the July 13, 2015 report generated from Backgroundchecks.com and relied on by RealPage is attached hereto as Exhibit A-5.

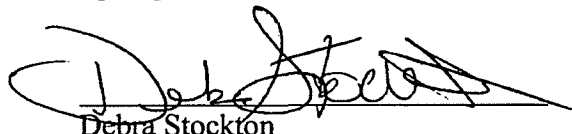
8. On July 13, 2015, the same day that Mr. Harter submitted a dispute to RealPage and no more than two days after Mr. Harter's original application to Legend Oaks Apartments, RealPage concluded that the traffic offense, although accurate and truthful, was not the type of record considered by the properties in making lease application decisions and emailed both properties indicating that RealPage had "determined that the record should be removed from the consumer's file." A true and correct copy of RealPage's July 13, 2015 email from RealPage to Legend Oaks Apartments is attached hereto as Exhibit A-6. A true and correct copy of RealPage's July 13, 2015 email from RealPage to Helios Apartments is attached hereto as Exhibit A-7.

9. Exhibit A-8 sets forth information that appears on-line when the hyperlinks "Disclosure From Jurisdictions Returning Results" or "Criminal Disclosure" on the bottom of Exhibit A-1 is clicked by a user of Exhibit A-1.

10. Exhibit A-9 sets forth information that appears on-line when the hyperlinks "Disclosure From Jurisdictions Returning Results" or "Criminal Disclosure" on the bottom of Exhibit A-2 is clicked by a user of Exhibit A-2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/16/2016


Debra Stockton